

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN SECTION OF TENNESSEE
WESTERN DIVISION

SCOTT TURNAGE, DEONTAE TATE, JEREMY S.)	Case No. 2:16-cv-2907-
MELTON, ISSACCA POWELL, KEITH BURGESS,)	SHM/tmp
TRAVIS BOYD, TERRENCE DRAIN, and)	
KIMBERLY ALLEN on behalf of themselves and all)	(Hon. Judge Samuel H. Mays)
similarly situated persons,)	
)	
PLAINTIFFS,)	
v.)	
)	
BILL OLDHAM, in his individual capacity as former)	
Sheriff of Shelby County, Tennessee; FLOYD)	
BONNER, JR., in his official capacity as Sheriff of)	
Shelby County, Tennessee; ROBERT MOORE, in his)	
individual capacity as former Jail Director of Shelby)	
County, Tennessee; KIRK FIELDS, in his official)	
capacity as Jail Director of Shelby County, Tennessee;)	
CHARLENE McGHEE, in her individual capacity as)	
former Assistant Chief of Jail Security of Shelby County,)	
Tennessee; REGINALD HUBBARD, in his official)	
capacity as Assistant Chief of Jail Security of Shelby)	
County, Tennessee; DEBRA HAMMONS, in her)	
individual capacity as former Assistant Chief of Jail)	
Programs of Shelby County, Tennessee; TIFFANY)	
WARD in her official capacity as Assistant Chief of Jail)	
Programs of Shelby County, Tennessee; SHELBY)	
COUNTY, TENNESSEE, a Tennessee municipality;)	
TYLER TECHNOLOGIES, INC., a foreign corporation;)	
GLOBAL TEL*LINK CORPORATION, a foreign)	
corporation; SOFTWARE AG USA, INC., a foreign)	
corporation; and SIERRA-CEDAR, INC., a foreign)	
corporation, SIERRA SYSTEMS GROUP, INC., a)	
foreign corporation; and TETRUS CORP, a foreign)	
corporation)	
DEFENDANTS.)	

**JOINT MOTION FOR (1) FINAL APPROVAL OF PROPOSED CLASS ACTION
SETTLEMENT AGREEMENT, (2) FINAL CERTIFICATION OF CLASS, AND (3)
FINAL APPROVAL OF THE DISSEMINATION OF CLASS NOTICE (“FINAL
APPROVAL MOTION”)**

Plaintiffs Scott Turnage, Deontae Tate, Jeremy S. Melton, Aubrey L. Brown, as administrator ad litem of the estate of Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen, on behalf of themselves and all other similarly situated persons (“Plaintiffs”), by and through their Rule 23(g)(3) appointed Interim Class Counsel, and Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, in their individual and/or official capacities, and Shelby County, Tennessee (“County Defendants”), and Tyler Technologies, Inc., Global Tel*Link Corporation, Software AG USA, Inc., Sierra-Cedar, Inc., Sierra Systems Group, Inc., and Tetrus Corp. (the “Vendor Defendants”) (collectively, the County Defendants and Vendor Defendants are referred to herein as the “Defendants”), by and through their respective attorneys, hereby move this court pursuant to Federal Rule of Civil Procedure 23(e) for an order (1) finally approving of the terms of the Stipulation and Settlement Agreement dated April 2, 2021 (the “Agreement”)(ECF No. 369-2) and the Supplemental Agreement (“Supplemental Agreement”) filed on July 23, 2021 (ECF No. 375-1), (2) granting final certification of the Class previously certified under Rule 23(b)(3), and (3) finally approving the dissemination of Notice previously approved by the Court to the proposed Class.

In support of this Motion, Plaintiff relies on the concurrently filed Memorandum of Law, all declarations filed in support of this Motion, and Plaintiff’s separate Motion for Fees, Expenses and Incentive Awards, and all supporting documentation.

WHEREFORE, PREMISES CONSIDERED, Plaintiff moves this Court for an Order: (1) finally approving of the terms of the Stipulation and Settlement Agreement dated April 2, 2021 (the “Agreement”)(ECF No. 369-2) and the Supplemental Agreement (“Supplemental

Agreement”) filed on July 23, 2021 (ECF No. 375-1), (2) granting final certification of the Class previously certified under Rule 23(b)(3), and (3) finally approving the dissemination of Notice previously approved by the Court to the proposed Class.

Dated: November 1, 2021

Respectfully submitted,

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